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Metropolitan Life Insurance Company

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

CORLISS LEE,
Plaintiff,
vs.

METROPOLITAN LIFE INSURANCE
COMPANY, INC., a New York
Corporation; and DOES 1 through 50,
Defendants.

CASE NO.: CV 13-05458 VC
Honorable Vince Chhabria

**PARTIES' STIPULATION TO
EXTEND DISCOVERY CUT-OFF
BY THIRTY DAYS; AND
~~PROPOSED~~ ORDER**

Complaint Filed: September 19, 2013

1 Plaintiff CORLISS LEE ("Plaintiff") and Defendant METROPOLITAN LIFE
2 INSURANCE COMPANY ("MetLife") (collectively "Parties"), by and through their
3 respective counsel of record, hereby stipulate to extend the discovery cut-off date
4 thirty days from December 10, 2014 to January 9, 2015.

5 Good cause exists for this extension as the Parties have been actively engaged
6 in completing written discovery and depositions for several months, however, they
7 have been unable to complete the depositions due to calendar conflicts between
8 counsel and the deposition witnesses. Plaintiff's counsel is unavailable for
9 depositions between November 27 and December 7, 2014 due to a pre-planned
10 vacation. Further complicating the scheduling of the final depositions is that they
11 require bi-coastal travel during the holiday season, as some of the remaining
12 witnesses are located in Connecticut and Florida. These calendar and travel conflicts
13 make it impractical to complete the depositions before December 10, 2014. Counsel
14 jointly believe the remaining depositions can be completed before January 9, 2015.
15 To ensure the Parties are able to complete the mutually desired discovery, and that
16 neither party is prejudiced by unavoidable discovery conflicts, the Parties stipulate to
17 a thirty-day extension of the discovery cut-off. The requested extension of the
18 discovery deadline to January 9, 2015 will not impact any of the previously set
19 deadlines or trial date.

20
21 IT IS SO STIPULATED.

22
23 Dated: November 26, 2014

GATES EISENHART DAWSON

24
25 By: */s/ Nicholas G. Emanuel* _____
26 Nicholas G. Emanuel
27 Attorneys for Plaintiff Corliss Lee
28

1 Dated: November 26, 2014

HINSHAW & CULBERTSON, LLP

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3 By: /s/ Royal F. Oakes
4 ROYAL F. OAKES
5 MICHAEL A.S. NEWMAN
6 JAMES C. CASTLE
7 Attorneys for Defendant
8 Metropolitan Life Insurance
9 Company

10 **ORDER**

11 Pursuant to the parties' stipulation, and good cause appearing, the discovery
12 cut-off is extended to January 9, 2015.

13 **IT IS SO ORDERED:**

14
15 Dated: December 18, 2014

16 
17 Hon. Vince Chhabria